

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, et al.,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

**DEFENDANTS DAVID MATTHEW PARROTT, MATTHEW HEIMBACH, AND
TRADITIONALIST WORKER PARTY'S DEPOSITION DESIGNATIONS**

Defendants David Matthew Parrott, Matthew Heimbach, and Traditionalist Worker Party, by and through their counsel, respectfully submit the following designations of deposition testimony. Defendants reserve the right to: (a) use audio and/or video deposition excerpts and/or create demonstrative exhibits; (b) use any deposition designations listed by Plaintiffs or any other Defendant(s); (c) supplement these designations with those of any persons listed as trial witnesses by any party in the event that such witnesses are not available to testify at trial or are not called at trial; (d) designate additional portions of deposition transcripts for the purpose of authentication of documents, if required; (e) designate any deposition testimony taken after the date of these designations; and (f) use any and all deposition and/or trial testimony, whether or not designated, for cross-examination, impeachment, or rebuttal purposes.

Deposition Transcript	Date	Designations
Chelsea H. Alvarado	July 15, 2020	32:18-38:21 41:12-42:13 43:2-43:16 45:16-46:9 47:10-50:7 51:9-51:25 53:2-53:14 56:15-57:13 62:25-63:14 65:24-70:17 71:9-73:10 112:16-118:16 125:5-131:22 141:23-146:3 148:15-155:12
Thomas Baker	July 17, 2020	11:23-31:20 49:2-50:7 51:17-53:8 56:16-58:11 59:3-59:13 60:17-66:18 71:21-78:25 81:2-81:25 85:4-87:7
Marissa Christine Blair	July 9, 2020	24:6-26:5 26:13-27:14 28:15-28:24 30:7-30:13 32:7-32:10 34:9-36:10 37:11-44:22 45:11-67:12 73:18-75:12
Marcus Martin	July 14, 2020	10:8-19:25 35:12-38:25 41:19-42:20 47:24-54:16 55:4-55:19 58:9-59:19 61:17-62:25 74:12-75:25

Deposition Transcript	Date	Designations
April Muniz	July 17, 2020	14:20-40:15 44:11-47:8 49:20-50:25 52:3-55:3 58:17-60:12 67:2-67:16 69:14-70:12
Natalie Romero	July 14, 2020	14:13-19:22 21:3-34:18 38:3-50:3 53:5-76:15 84:22-85:21
Elizabeth Sines	July 8, 2020	15:11-15:21 18:19-20:6 23:10-26:10 28:9-28:19 32:3-38:13 40:22-53:17 65:10-78:18 86:20-90:25 96:8-98:23 109:14-109:25 112:15-114:15 118:15-124:11 139:2-198:7
Devin Willis	July 16, 2020	14:15-15:7 19:4-22:11 26:4-27:15 61:6-62:15 69:23-71:25 83:15-84:5

Deposition Transcript	Date	Designations
Seth Wispelwey	July 24, 2021	33:15-34:6 34:22-35:7 47:5-47:17 58:20-58:23 64:5-64:9 69:19-69:23 71:16-72:6 81:9-81:12 83:6-84:20 125:25-126:10 134:3-134:11 191:13-192:24 210:13-211:25

/s/ Joshua Smith

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 Parrott, Matthew Heimbach, and
 Traditionalist Worker Party*

Dated: October 29, 2021

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to all counsel of record in the case, as well as all ECF-registered *pro se* parties.

I hereby further certify that on October 29, 2021, I served a copy of the foregoing on the following non-ECF *pro se* parties, via electronic mail, as follows:

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I hereby further certify that on October 29, 2021, I served a copy of the foregoing on the following non-ECF *pro se* party, via first-class mail, as follows:

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